

THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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THE UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CASERTA,

Defendant.

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Case No: 1:20-CR-183

Honorable Robert Jonker

**DEFENDANT BRANDON CASERTA'S**  
**MOTION TO COMPEL DISCOVERY**

NOW COMES Defendant, Brandon Caserta, through counsel, pursuant to Federal Rule of Criminal Procedure 16, respectfully requests this Honorable Court enter an Order requiring the United States to produce to Defendant a copy of the forensic imaging data/data extracted for forensic examination or, in the alternative, the physical phone and electronic devices seized from Defendant Caserta; Specifically Defendant requests the information from: (1) Defendant's cellular phone and associated electronics seized by the government;<sup>1</sup> (2) the cellular phone used in this investigation by CHS-2 (confidential human source) and associated electronics supplied and/or paid for by the government; (3) the cellular phone used by S.A. Impola during this investigation; and (4) the cellular phone used by S.A. Chambers during this investigation.

This Motion is accompanied by a Brief in Support.

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<sup>1</sup> Counsel has spoken to A.U.S.A. Nils Kessler who indicates he will comply with the request for Defendant's phone and associated electronics contents. It is anticipated the issue regarding Defendant's phone and electronics will be moot soon after filing this motion. Counsel includes Defendant's phone request in this motion as trial is looming and generally speaking phones and electronics contain large amounts of data that must be sifted and reviewed syphoning time away from trial preparation.

Respectfully Submitted,  
HILLS LAW OFFICE, P.C.

Dated: July 12, 2021

/s/Michael D. Hills  
Michael D. Hills (P58571)  
Attorney for Defendant

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